

Joint Status Report Pursuant to Rule 26(f)

Caption: Anne Whitney Collins v. Eastern University Civil Action No: 2:23 - cv -02693

Basis of Jurisdiction: Federal Question

Jury Trial: x Non-Jury Trial: _____ Arbitration: _____

Plaintiff's counsel participating in the Rule 16 Conference: Jennifer M. Chalal, Esquire

Defendants counsel participating in the Rule 16 Conference: Glenn R. Davis, Esquire

Do counsel have full authority to settle at Rule 16 Conference? Plaintiff's counsel has full authority, but Plaintiff will be attending the conference. Defendant's counsel does not have full authority.

If not, client with such authority who will attend conference: For Defendant:

1. Kacey Bernard, Eastern University Chief Human Resources Officer
2. Trevor Jackson, Eastern University Vice President for Finance and Operations
3. Crista Bevilacqua, J.D., Wright Insurance Representative

When did the parties hold the Rule 26 Conference? January 10, 2024

When did the parties comply with the Rule 26(a)'s duty of self-executing disclosure? Plaintiff issued her self-executing disclosure on October 16, 2023. Defendant issued its self-executing disclosure on November 13, 2023.

Does either side expect to file a case-dispositive motion? Defendant intends to file a dispositive motion

If yes, under what Rule: Rule 56

If yes, specify the issue: Prima Facie Elements

Proposed deadline for filing dispositive motions: 45 days after discovery period ends

Does either side anticipate the use of experts? Yes.

If yes, what is the proposed deadline for expert discovery? 30 days after discovery period ends.

Approximately date case should be trial-ready: 60 days after dispositive motion is decided

Time for Plaintiff's case: 2 days Time for Defendant's case: 2 days

Is a settlement conference likely to be helpful? Yes If so, when:

Early: No After Discovery: Yes

Do the parties wish to proceed before a Magistrate Judge for final disposition? Not at this time

Plan for Discovery:

1. The parties anticipate that discovery should be completed within 60 days.
 2. What is the minimum amount of time necessary to complete discovery prior to an ADR session, should one be ordered or agreed to? 30 days
 3. Have the parties discussed issues relating to claims of privilege or of protection as trial-preparation material, as required by Rule 26(f)(3)(D)? Yes
 4. Identify any other discovery issues which should be addressed at the Rule 16 Conference, including limitations on discovery, protective Orders needed, or other elements which should be included in a particularized discovery plan. The parties intend to submit a Litigation Confidentiality Agreement for the Court's approval.
 5. If you contend the discovery period to exceed 90 days, please state reason: N/A
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6. Do the parties anticipate the need to subpoena any third parties? Yes

If yes, to the extent any authorizations or releases are required to be signed, counsel should exchange them in advance of the Rule 16 Conference.

Respectfully Submitted

SPECTOR GADON ROSEN VINCI, P.C.

By: /s/ Jennifer M. Chalal
Jennifer Myers Chalal, Esquire
(Pa. Atty. I.D. No. 77841)
1635 Market Street, 7th Floor
Philadelphia, PA 19103
215-241-8888 (p)/215-241-8844(f)
jchalal@sgrvlaw.com

Counsel for Plaintiff, Anne Whitney Collins

Dated: January 11, 2024

LATSHA DAVIS & MARSHALL, P.C.

By: /s/ Glenn R. Davis
Glenn R. Davis, Esquire
(Pa. Atty. I.D. No. 31040)
Andrew P. Dollman, Esquire
(Pa. Atty. I.D. No. 209466)
1700 Bent Creek Blvd., Suite 140
Mechanicsburg, PA 17050
717-620-2424(p)/717-620-2444 (f)
gdavis@ldylaw.com
adollman@ldylaw.com

Counsel for Defendant, Eastern University